

Schedule a Status Conference, dated April 17, 2023 (D.I. 164) (the “Motion”) (Dkt. No. 677) (the “**Ad Hoc Group Filing**”), and respectfully state as follows:

1. On April 10, 2023, the Ad Hoc Group of First Lien Lenders (the “**Ad Hoc Group**”) filed the Ad Hoc Group Filing. Pursuant to this Joinder, the LCM Lenders hereby join in, incorporate by reference, and adopt as their own, the arguments and assertions of the Ad Hoc Group in the Ad Hoc Group Filing.²

2. In further support of this Joinder, the LCM Lenders state the below additional relevant facts.

3. The LCM Lenders have interposed, *inter alia*, a counterclaim for breach of the covenant of good faith and fair dealing as against Plaintiffs (Dkt. 146).

4. On April 10, 2017, Plaintiffs served on the LCM Lenders 22 document requests, 6 interrogatories, and 7 requests for admission.

5. The LCM Lenders reserve the right to question any witness who sits for deposition.

² Unless otherwise defined herein, capitalized terms shall have the meanings set forth in the Ad Hoc Group Filing.

Dated: April 20, 2023

Respectfully submitted,

McKOOL SMITH, PC

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing pleading was served by electronic delivery on all persons and entities receiving ECF notice in this case on April 20, 2023.

/s/ John J. Sparacino

John J. Sparacino